

EXHIBIT B



May 4, 2021

James W. McConkie III
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Salt Lake City, Utah 84111

jmccconkie@wnlaw.com

By email only

Re: Thread Wallets, LLC Intellectual Property
KB&A Docket No.: 4436.7.1

Dear James,

We are in receipt of your letter of April 22, 2021 on behalf of your client Thread Wallets, LLC ("Thread Wallets") regarding our client Brixley Bags, LLC ("Brixley Bags"). While Brixley Bags denies each of the allegations and reserves its rights to enforce its own intellectual property against Thread Wallets, we appreciate your client's desire to resolve its allegations amicably, and Brixley Bags similarly desires an amicable resolution.

However, the letter fails to provide Brixley Bags with any notice of the intellectual property rights they are allegedly infringing. While the letter does mention "multiple design patents pending," the scope claimed in those design patent applications is not disclosed, and the letter instead focuses on Thread Wallets' "significant reputation and considerable goodwill amongst the consuming public" and that "consumers are likely to be confused" neither of which are relevant factors when determining patent infringement, even if the scope of the pending design patent applications had been disclosed in the letter.

A demand letter alleging patent infringement but lacking "the patent numbers of the patent or patents being asserted" is the first factor indicating a bad faith assertion of patent rights in Utah Code §78B-6-1903, the Distribution of Bad Faith Patent Infringement Letters Act. While we understand that your client has not yet been granted any patent rights and such potential rights are currently undefined and may never be granted, at a minimum, copies of the pending patent applications or the figures indicating potential claim scope would at least provide some basis for your client's premature allegations, allowing Brixley Bags to at least tentatively "assess the merits of the assertion of patent infringement" pursuant to Utah Code §78B-6-1903 at this early stage, prior to any actual patent rights being granted.

Brixley Bags looks forward to amicably resolving your client's allegations, if possible, once your client's patent rights have been defined and granted. If your client decides to continue to pursue their allegations of infringement prior to being granted any actual patent rights, we would appreciate any information they are willing to provide regarding the current scope of their design patent applications, with the understanding that the scope may change prior to patent grant, if any.

Sincerely,

Kunzler Bean & Adamson

Scott C. Hilton

Attorney for Brixley Bags, LLC